

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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TOWN & COUNTRY JEWELERS, LLC,	:	CIVIL ACTION
individually and on behalf of all others	:	
similarly situated,	:	NO. 3:15-cv-02519-PGS-LHG
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
MEADOWBROOK INSURANCE GROUP,	:	
INC.,	:	
	:	
Defendant.	:	

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**NOTICE OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, EXPENSES AND  
INCENTIVE AWARD**

**PLEASE TAKE NOTICE** that at the Final Approval Hearing Scheduled for December 06, 2017, Plaintiff will move to have the Court enter the proposed order submitted herewith that will grant their motion seeking (1) one third of the common fund (\$500,000) shall be paid to Plaintiff's Counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive award of \$10,000 to the Class Representative, which shall be paid out of the one third of common fund.<sup>1</sup>

**PLEASE FURTHER NOTE** that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel in Support, and any other related materials in support of this motion.

**PLEASE FURTHER NOTE** that Plaintiffs will rely on the Proposed Final Approval Order filed with the Motion to Certify Class. *See* Docket No. 71 exhibit 5 and a copy of the Final Approval Order is being resubmitted here for convenience and reference.

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<sup>1</sup> Plaintiffs will also request that the Court enter an order granting final approval of the settlement. A motion seeking that relief will be filed separately.

Dated: August 31, 2017

/s/ Ari Marcus

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